

# United States District Court

## EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

BRADLEY ALEX TILLEY,

*Defendant.*

### CRIMINAL COMPLAINT

Case No. 21-MJ-183-KEW

I, Timkiya Taylor, the undersigned complainant, state that the following is true to the best of my knowledge and belief.

On or about May 22<sup>nd</sup> to 23<sup>rd</sup>, 2020, in the Eastern District of Oklahoma, defendant(s) violated Title 18, United States Code, Sections 2242(2), 2246(2)(A), 1151 & 1153, by committing the crime of Sexual Abuse in Indian Country, an offense described as follows:

Sexual Abuse in Indian Country, Title 18, U.S.C. §§ 2242(2), 2246(2)(A), 1151 & 1153, by placing his penis in the vagina and anus of D.D., an adult, when D.D. was incapable of appraising the nature of the conduct, and was incapable of declining participation in, or communicating unwillingness to engage in that sexual act.

I further state that I am a Special Agent with Federal Bureau of Investigation, and that this complaint is based on the following facts:

(See attached Affidavit of Timkiya Taylor, which is attached hereto and made a part hereof by reference.)

☒ Continued on the attached sheet.



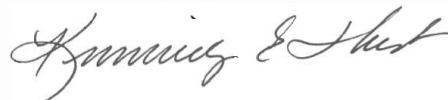
Timkiya Taylor  
Complainant

Sworn to before me and subscribed in my presence at: MUSKOGEE, OKLAHOMA

Date: April 22, 2021

UNITED STATES MAGISTRATE JUDGE

Name and Title of Judicial Officer



Signature of Judicial Officer



**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF OKLAHOMA**

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Timkiya D. Taylor, being duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been employed with the agency since September 2018. I have been trained to conduct criminal investigations by the FBI and the Tennessee Bureau of Investigation (TBI) while attending their 21 and 16-week basic field training courses respectively. Before joining the FBI, I served as a team leader on the execution of a federal search warrant and participated in the execution of other search warrants during my 5-year tenure with the TBI. With the FBI, I am currently assigned to work complex financial crime matters, including the investigation of healthcare fraud, financial institution fraud, corporate fraud and wire fraud in the Oklahoma City area. I hold a Master of Arts in Criminology from the University of Memphis. In addition, I received training in a variety of investigative and legal matters, including the topics of violent crimes and sexual assault while at the FBI Academy.

As a Federal Agent, I am authorized to investigate violations of the laws of the United States and to execute warrants issued under the authority of the United States.

The statements contained in this Affidavit are based in part on information provided by other agencies; written reports about this and other investigations that I have received directly or indirectly from other law enforcement agents; independent investigations; and my experience, training, and background as a Special Agent with the FBI. Because this Affidavit is being submitted for the limited purpose of establishing probable cause, I have not included every detail of the investigation. In addition, unless otherwise indicated, all statements contained in this

Affidavit are summaries in substance and in part. The following is true to the best of my knowledge and belief.

### **STATUTORY AUTHORITY**

18 U.S.C. § 2242(2) prohibits a person from committing a sexual act upon another person when the person knows or reasonably should know that the other person is asleep, unconscious, or otherwise unaware that the sexual act is occurring or when the other person is incapable of consenting to the sexual act due to impairment by any drug, intoxicant, or other similar substance, and that condition is known or reasonably should be known by the person.

### **PROBABLE CAUSE**

This affidavit is made in support of a Complaint and Arrest Warrant based on probable cause to believe that BRADLEY TILLEY committed a violation of Sexual Abuse in Indian Country, Title 18, United States Code, Sections 2242(2), 2246(2)(A), 1151 & 1153, which occurred within the boundaries of the Seminole Nation. In support of this request, I submit the following:

VENUE: The facts and circumstances alleged in this Affidavit occurred within the Eastern District of Oklahoma. More specifically, based on the Supreme Court decision in *McGirt v. Oklahoma* (2020), and *Bosse v. State* (2021) from the Oklahoma Court of Criminal Appeals, the below-described location is within the reservation boundaries of the Seminole Nation and therefore are within Indian Country.

DEFENDANT: The defendant is BRADLEY TILLEY, date of birth XX/XX/1997. For purposes of establishing federal jurisdiction, BRADLEY TILLEY, hereinafter referred to as TILLY, is an Indian and enrolled member of the Muscogee Creek Nation.

VICTIM: The victim of the offense is D.D, date of birth XXX/XX/1997.

On May 27, 2020, D.D. presented at the Seminole Police Department to report that she was

raped by TILLEY, a man she worked with at Bar-S. D.D. told officers that on May 22, 2020, she went to TILLEY's home on Truman Avenue after work to drink alcohol and smoke marijuana. D.D. noted during a recorded interview with Corporal Logan Gray that she had a lot to drink and at some point in the evening, she passed out after drinking several beers and alcohol shots. Prior to passing out, D.D. recalled talking and listening to music with TILLEY. She advised that TILLEY asked her twice, "Are you trying to get this d\*ck?" D.D. stated she told TILLEY that she could not do that because TILLEY previously dated her friend "Sally." D.D. also recalled explaining to TILLEY that she had not had sex in approximately a year and was not ready to do so. D.D. reported that she had never been sexually active with TILLEY and considered him only as a friend.

D.D. recalled advising TILLEY that she needed to stay longer to sober up before driving home. She then remembered TILLEY putting her in his bed and taking off her panties. D.D. reportedly told TILLEY to stop and tried to push him away, but she was too weak. She stated TILLEY then inserted his penis into her anus, causing D.D. to scream in pain. TILLEY removed his penis from her anus and then inserted it into her vagina.

D.D. stated that she awakened the morning of May 23, 2020, at TILLEY's house with TILLEY on top of her inserting his penis back into her anus. When TILLEY finished, he walked out of the room. D.D. then got up and walked to the living room. D.D. tried to leave the home but was reportedly stopped by TILLEY. She noted that she was covered in feces and confronted TILLEY about what had transpired between the two of them. D.D. then grabbed her phone, jacket and a sweater and fled the home, leaving behind her underwear, pants, and shirt, which were all covered in feces. She also left behind a pair of sandals.

D.D. forwarded text messages to the officers that she received from TILLEY May 26-27, 2020, after she texted him to find out what happened the night of the incident. In the messages,

TILLEY apologized for having sex with D.D. but claimed he was too intoxicated to remember the details. He then offered to allow D.D. to shoot him in the arm or leg to resolve the matter without getting law enforcement involved.

On May 27, 2020, officers executed a Seminole County District search warrant for TILLEY's residence on Truman Avenue, Seminole, Oklahoma. During the search execution, they observed what appeared to be the sandals D.D. left at the home, a brown-stained air mattress in a room D.D. previously described to them, empty liquor bottles, and mail addressed to TILLEY. In the trash, officers discovered the following: black leggings, pink thong panties, a pair of boxer underwear, a collared shirt, and three t-shirts, all containing what appeared to be feces on them.

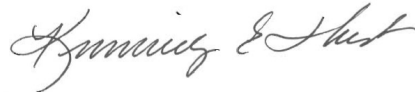
Based on a review of this case and based on my knowledge and experience with violent crimes, I, as your Affiant, have probable cause to believe that BRADLEY TILLEY committed the offense of Sexual Abuse in Indian Country, in violation of Title 18, United States Code, Sections 2242(2), 2246(2)(A), 1151 & 1153.

Respectfully Submitted,



Timkiya Taylor, Special Agent  
Federal Bureau of Investigation

Sworn before me this 22<sup>nd</sup> day of April 2021.



UNITED STATES MAGISTRATE JUDGE